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ATTACHMENT—WHAT CONSTITUTES.—The plaintiff, formerly a deputy sheriff, claims that he attached certain potatoes of a produce company, then in defendant's cars, by looking into the cars, seeing the potatoes, and saying: "I attach these potatoes"; even though he did not actually lay hands upon them, nor take them into his possession otherwise than as above stated. *Held*, the attachment was good. *Rogers v. Maine Cent. R. Co.* (Me. 1915), 94 Atl. 758.

An actual levy is usually required in the case of chattels. In such cases actual possession and custody are necessary to constitute an attachment. *Adler v. Roth*, 5 Fed. 895; *Darling v. Dodge*, 36 Me. 370. If the property is within the officer's dominion, so that he could seize, the omission to seize is excused where it would put the officer to too great an expense or trouble. For instance it has been held a valid levy, where the officer, standing by the edge of a field, wrote down the names and colors of three colts, *Green v. Burk*, 23 Wend. (N. Y.), 490; and where the officer posted notice on the door of a barn, a levy on hay therein was sustained. *Merrill v. Sawyer*, 25 Mass. (8 Pick.) 397. A levy on grain in a stack was sustained where the officer went to it and forbade the defendant to touch it, *Gallagher v. Bishop*, 15 Wis. 276. A levy on corn in a crib by nailing it up, notifying the defendant and spectators of the levy, was sustained against a subsequent purchaser from the defendant. *Richardson v. Rardin*, 88 Ill. 124. Where an officer went onto mill logs, found in a river, and marked some of them "attached Dec. sixth," a levy was sustained. *Bicknell v. Trickey*, 34 Me. 273. An attachment of ore of an iron company was sustained where the officer informed the workmen and the clerk of the company, that he had attached the ore. On the other hand, it was held that the tacking of an order of attachment on tan bark in a car standing off on a switch, and telling the local agent that the bark was levied upon as property of the shipper, was an insufficient levy in *Louisville & N.R. Co. v. Spalding*, 7 Ky. Law Rep. 211. A levy was not sustained where the officer went to the barn where some hay was stored and there posted a notice that he attached all the hay in which A had any interest. *Bryant v. Osgood*, 52 N. H. 182. An officer, who goes to a building to levy on its contents, and being unable to get in, proclaims at the window that he levies on all the property in the building, has made no levy. *Meyer v. Missouri G. Co.*, 65 Ark. 286, 67 Am. St. Rep. 927. Where an officer went to the door of a carriage-house, unlocked the same, declaring that he attached the property within, but before he had actually touched a carriage, another officer sprang in and seized it, an attachment was not sustained in favor of the first officer. *Hollister v. Goodale*, 8 Conn. 331. From these cases it would seem that the principal case is pretty near the line.

BANKRUPTCY—PROPERTY PASSING TO TRUSTEE.—Plaintiff, at the time he was adjudicated a bankrupt, was duly licensed to engage in the sale of intoxicating liquors. Defendant, his trustee in bankruptcy, allowed the plaintiff to continue to operate his place of business under the license. After all the liquor had been sold, trustee charged the amount thus realized against the exemptions allowed plaintiff by the statute of the state. *Held*, regard-